

3. All "covered entities," as defined in 45 C.F.R. § 160.103, are authorized to disclose protected health information pertaining to Virgin Martinez, Tahir Ellison and Kevin Redding to all attorneys in this Action.

4. The parties and their attorneys shall be permitted to use the protected health information in any manner reasonably connected with the Action, including, but not limited to, disclosure to the parties and their attorneys, insurers, claims managers, experts, and consultants, the court, necessary court personnel, court reporters, copy services, trial consultants, jurors, any appellate court, and other persons and entities involved in the litigation process.

5. All protected health information produced or disclosed in the Action shall be used solely for the prosecution or defense (including any appeal therefrom) of the Action, and shall not be used for any other purpose.

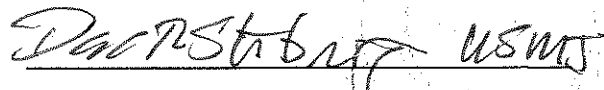
6. Any person or entity in possession of protected health information shall maintain the information in a reasonably secure manner, and shall not reveal to or discuss such information with any person not entitled to receive it, so that the protected health information is not further disclosed or used in any manner inconsistent with this Order.

7. Within 45 days after the conclusion of this action, the parties, their attorneys, and any other persons or entities that came into possession of the protected health information through this Action shall return the protected health information to the covered entity that provided it, or destroy the protected health information, except for health information that was submitted to the court or health information that the party was entitled to have under HIPAA.

8. Nothing in this Order authorizes counsel to obtain medical records or information through means other than formal discovery requests, subpoenas, depositions, patient authorizations, or other lawful processes.

9. This Order does not control or limit the use of protected health information pertaining to Virgin Martinez Tahir Ellison and Kevin Redding that comes into possession of any party, or any party's attorney, from a source other than a covered entity as defined in 45 C.F.R. § 160.103.

SO ORDERED.


MAR 24, 2023

SIGNED AND AGREED TO this 21st of March 2023.

COUNSEL FOR PLAINTIFF:

/s/ Helen A. Lawless
Helen Lawless, Esq..

COUNSEL FOR DEFENDANTS:

/s/ Derek Kane
Attorney for Defendants Christian Kane, Alexander Hernandez and the City of Philadelphia

/s/ KELLY J. FOX
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Attorney for Defendant Tahir Ellison